

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI**

**In re: ODELL NMN RIVERS SR  
CINDY ELAINE RIVERS**

**Case No.: 19-41304-drd-13**

**Debtors**

**TRUSTEE'S OBJECTION TO MOTION  
TO SUSPEND PLAN PAYMENTS**

COMES NOW Richard V. Fink, Chapter 13 Trustee, and files this objection to the Motion to Suspend Plan Payments (ECF Doc. #177) filed on October 12, 2023 and in support thereof states:

1. The plan runs 86 months based on currently available information. Based on the trustee's analysis, the reason(s) the plan runs long include:
  - The ongoing mortgage payment(s) being paid through the plan are not current due to a history of delinquency in plan payments.
  - Default in plan payments.

WHEREFORE, the Chapter 13 Trustee files this objection to the Motion to Suspend Plan Payments and requests a hearing be held on the matter.

October 17, 2023

Respectfully submitted,

/s/ Richard V. Fink, Trustee

Richard V. Fink, Trustee  
2345 Grand Blvd., Ste. 1200  
Kansas City, MO 64108-2663  
(816) 842-1031

**NOTICE OF SERVICE**

The following parties will be served either electronically or by United States First Class Mail and a certificate of service will be filed thereafter:

DEBTOR(S)  
WAGONER BANKRUPTCY GROUP (206) - ATTORNEY FOR DEBTOR(S)

/s/ Richard V. Fink, Trustee